

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Elizabeth Sichinga	:	Chapter 13
	:	No.: 21-13246-PMM
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY PENNSYLVANIA HOUSING FINANCE AGENCY

Debtor, Elizabeth Sichinga, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Pennsylvania Housing Finance Agency hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted
5. Admitted
6. Admitted.
7. Admitted
8. Debtor is unsure of the same.
9. Admitted.
10. Debtor avers an attempt was made to make a payment. Debtor is holding the funds and asks for a chance to cure and catch up.
11. Denied.

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: March 18, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Scott F. Waterman, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Leon P. Haller, Esq.
Attorney for Movant *Pennsylvania Housing Finance Agency*.
Electronic Notice to *lhaller@pkh.com*

Dated: March 18, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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